

**In the United States District Court
for the Southern District of Texas
Houston Division**

**United States of America ex rels.
Lisa Powell and Marybel Picazo,
Plaintiff,**

v.

**Dr. Lubor Jarolimek and Orthopedic Care
Center,
Defendant.**

Civil Action No. 4:16-cv-01419

The Parties' Joint Report to the Court

Relators Lisa Powell and Marybel Picazo and Defendants Lubor Jarolimek, M.D., and Orthopedic Care Center (the "Parties") submit this joint report to the Court.

1. The Parties' review of the over 30,000 pages of documents recently produced by Medicare remains in progress but has yet to be completed. Work continues by Relators. Relators have completed their initial review and indexing of the over 30,000 pages of documents produced by Medicare. Given continued work needed, Relators believe that an additional 60-90 days is needed to complete their in-depth review and detailed analysis of the over 6,000 claims submitted by Dr. Jarolimek and the Orthopedic Care Center and to finalize a summary of the individual patient and billing information contained therein.

2. Reviewing voluminous documentation of this nature is time-consuming and requires careful investigation by both sides. Thus, once Relators have completed their review of the Medicare documents, Defendants believe they need an additional 30-45 days to complete their own review of same and to provide input to Relators. Thereafter, the Parties will be ready to provide a substantive report to Court along with a proposed go-forward plan.

3. The Parties are committed to completing this work and anticipate that only limited additional discovery may be needed to bring closure to this matter. While Relators disagree, Defendants believe that the matter should be decided on motion for summary judgment.

4. For these reasons, the Parties respectfully request that the Court allow an additional ninety-days for the Parties to finalize their review and extend the deadline for the Parties to file a joint status report to the Court on or before April 22, 2022.

Respectfully submitted,

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Certificate of Service

I hereby certify that on January 21, 2022, a true and correct copy of the foregoing has been served *via* the Court's ECF System and via email as follows:

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